

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Matthew Alexander Nielson; J.Z., a)
minor under age 18, by his parent &)
guardian Michele Stephens; D.M. a)
minor under age 18, by her parent &)
guardian Victoria Reed; and the Freedom)
From Religion Foundation, Inc.,)

C/A #: 3:12-cv-01427-CMC

**MOTION TO ENLARGE TIME FOR
FILING AMENDED PLEADINGS FOR
ALL PARTIES**

Plaintiffs,)

v.)

School District Five of Lexington &)
Richland Counties,)

Defendant.)
_____)

Counsel for Defendant, with the consent of Plaintiffs' counsel, move, pursuant to Local Civil Rule 6.01 DSC, for an order amending the Scheduling Order filed in this action enlarging the deadline for filing amended pleadings from the current deadline of November 9, 2012, until November 16, 2012.

The grounds for the motion are that the Defendant intends to amend its answer to assert affirmative defenses. That has been discussed with Plaintiff's counsel and they consent. However, Plaintiff's counsel indicates that their client recently requested to amend to assert an additional cause of action and they are preparing that. Defense counsel just learned of the topic of the proposed amendment today and has not had a chance to consult with the clients to determine whether consent can be given. Defense counsel is not filing the amended answer today because the Plaintiff may be amending their complaint and that would require an

additional pleading. The parties believe they can work this all out within the next seven days and either file consent amended pleadings or file motions if consent is not forthcoming. For that reason, the parties jointly request an additional seven days in which to file motions to amend the pleadings. The Plaintiff joins in this request.

MORRISON LAW FIRM, LLC

By: s/ David L. Morrison

David L. Morrison, (Fed. #3581)

Kassi B. Sandifer, (Fed. #7439)

7453 Irmo Drive, Suite B

Columbia, South Carolina 29212

Phone: (803) 661-6285

Fax: (803) 661-6289

E-mail: david@dmorrison-law.com

E-mail: kassi@dmorrison-law.com

ATTORNEYS FOR THE DEFENDANT

Columbia, South Carolina

November 9, 2012